

EXHIBIT

B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF JOCELYNE AMBROISE

I, Jocelyne Ambroise, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at Tower Two of the World Trade Center when the terrorist attacks of the World Trade Center Towers occurred.

4. I was employed by the Union Bank of California at the time. Its office was on the 14th floor of Tower Two.

5. I was in New York City at The World Trade Center Towers when the planes hit the towers. After the first plane hit Tower One, I saw the orange-red flames and thick black smoke. I remember looking at the side of building and wondering why it was painted red, but it was covered

in blood. My co-workers and I fled down the stairs of Tower Two. I witnessed unspeakable carnage on the mezzanine level. I was then directed to get out of the building by a security guard. Just as I got to the other side of the street, the second plane crashed into Tower Two. It was like a missile, the impact was so great. As I was attempting to escape the flying debris, I lost my footing and fell down. I hit my head so hard it bounced against the concrete. I managed to safely escape the site.

6. As a direct result of these terrorist attacks, I suffered the following specific physical injuries on September 11, 2001: traumatic head injury and a fracture to my left shoulder.

7. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever. Thus, as a result of these terrorist attacks and the events that I witnessed, I also began to suffer profound anxiety and depression.

8. For approximately nine months after the attacks, I had recurring dreams about the plane attacks. The dreams were so vivid at times that I would wake up in sweats. I had other dreams about running with children trying to find shelter.

9. I sought medical attention for my injuries and underwent physical therapy three times a week for six months. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received for my physical injuries caused by the September 11, 2001 terrorist attacks.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 30th day of December, 2019



Signature of Declarant, Jocelyne Ambroise

**EXHIBITS
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UNDER SEAL
(ECF No.
5716)**